

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

WILFREDO JOSE AVENDAÑO CARRIZALEZ
and
CARLOS GABRIEL SANTOS MOGOLLON,

Defendants.

25 MAG 894

SEALED COMPLAINT

Violations of 18 U.S.C. § 922(g)(5)

COUNTY OF OFFENSE:
BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

MICHAEL BONNER, being duly sworn, deposes and says that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”), and charges as follows:

COUNT ONE
(Possession of a Firearm by Illegal Alien)

1. On or about January 14, 2025, in the Southern District of New York and elsewhere, WILFREDO JOSE AVENDAÑO CARRIZALEZ and CARLOS GABRIEL SANTOS MOGOLLON, the defendants, each knowing that he was an alien illegally and unlawfully in the United States, knowingly possessed one or more firearms, to wit, a loaded Glock 9mm firearm and a loaded Taurus 9mm firearm, and the firearms were in and affecting commerce.

(Title 18, United States Code, Section 922(g)(5).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

2. I am a Special Agent with HSI and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, and my conversations with law enforcement officers, law enforcement employees, and witnesses, as well as my review of documents. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Since at least in or about October 2024, I have been conducting an investigation of suspected members and affiliates of the transnational criminal organization Tren de Aragua (“TDA”), including WILFREDO JOSE AVENDAÑO CARRIZALEZ and CARLOS GABRIEL SANTOS MOGOLLON, the defendants.

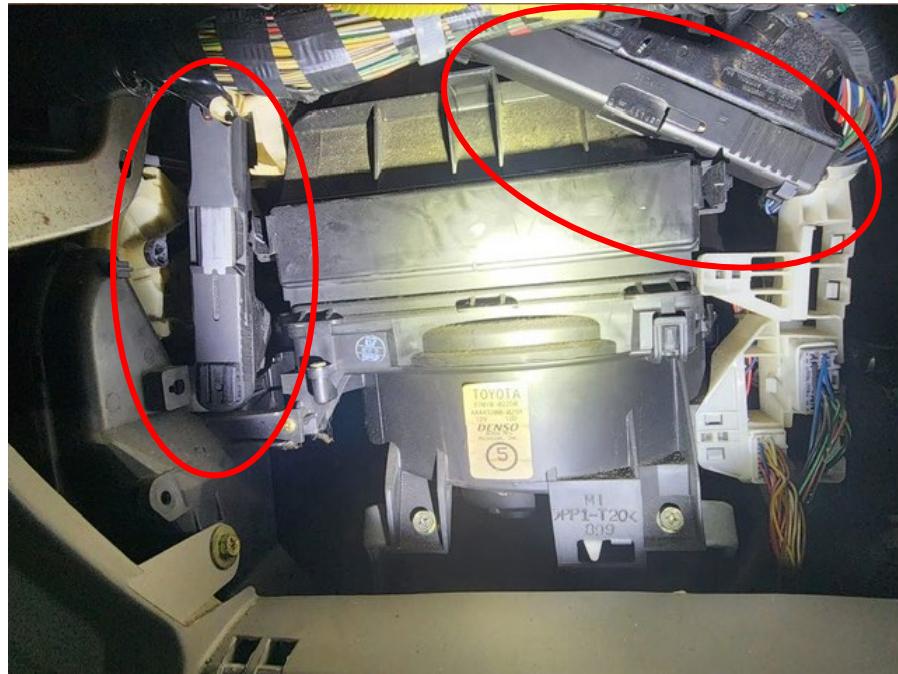
4. From my review of immigration records and my conversations with other law enforcement and immigration officers, I have learned, among other things, that WILFREDO JOSE AVENDAÑO CARRIZALEZ, the defendant, is a Venezuelan national without lawful immigration status in the United States. On or about December 21, 2023, AVENDAÑO CARRIZALEZ was encountered near the border and detained by immigration enforcement authorities. He was thereafter released pending an immigration removal proceeding. On or about February 10, 2025, an Immigration Judge issued an Order of Removal to remove AVENDAÑO CARRIZALEZ from the United States.

5. From my review of immigration records and my conversations with other law enforcement and immigration officers, I have learned, among other things, that CARLOS GABRIEL SANTOS MOGOLLON, the defendant, is a Venezuelan national without lawful immigration status in the United States. On or about August 20, 2023, SANTOS MOGOLLON was encountered near the border and detained by immigration enforcement authorities. He was thereafter released pending an immigration removal proceeding. On or about January 22, 2025, an Immigration Judge issued an Order of Removal to remove SANTOS MOGOLLON to Venezuela. SANTOS MOGOLLON was removed from the United States on or about March 5, 2025.

6. Based on my own observations and my conversations with other law enforcement officers, including Spanish-speaking law enforcement officers, I am aware of the following, among other things:

- a. Late in the evening on or about January 13, 2025, law enforcement observed a gray Toyota Corolla with a Pennsylvania license plate in the Bronx, New York. Based on a law enforcement database search, law enforcement learned that the license plate belonged to a different vehicle (a Mercedes Benz) registered to an address in Philadelphia, Pennsylvania. When law enforcement turned on their lights to effectuate a traffic stop, the Corolla fled through multiple red lights and eventually came to a stop when law enforcement used their vehicles to box in the Corolla.
- b. The Corolla was occupied by two individuals when it was stopped: WILFREDO JOSE AVENDAÑO CARRIZALEZ and CARLOS GABRIEL SANTOS MOGOLLON, the defendants. AVENDAÑO CARRIZALEZ was in the front passenger seat and SANTOS MOGOLLON was the driver.

- c. When law enforcement searched the Corolla (by which point it had become the early hours of January 14, 2025), they found two guns and high-capacity magazines loaded with ammunition tucked up in an area above and behind the glove box. In particular, law enforcement recovered a black Taurus 9mm handgun (the “Taurus Handgun”) and a black Glock 9mm handgun (the “Glock Handgun”), as shown below:



- d. AVENDAÑO CARRIZALEZ and SANTOS MOGOLLON were detained on immigration grounds following the vehicle stop.
- e. AVENDAÑO CARRIZALEZ was given *Miranda* warnings and consented to answer questions from law enforcement. AVENDAÑO CARRIZALEZ stated, in substance and in part, that he possessed the firearms that were found in the Corolla and explained that he had received them from another individual who, I believe based on my involvement in this investigation, is a member of TDA.
- f. SANTOS MOGOLLON was also given *Miranda* warnings and consented to answer questions from law enforcement. SANTOS MOGOLLON stated, in substance and in part, that he knew the guns were in the Corolla, which he was driving.

7. Based on my review of photographs and messages from a seized cellphone (as described below), my own observations, and my conversations with other law enforcement officers, including Spanish-speaking law enforcement officers, I am aware of the following:

- a. A cellphone was seized from the person of WILFREDO JOSE AVENDAÑO CARRIZALEZ, the defendant, upon his arrest (the “AVENDAÑO CARRIZALEZ Cellphone”). AVENDAÑO CARRIZALEZ consented to a law enforcement search of the AVENDAÑO CARRIZALEZ Cellphone.

b. The AVENDAÑO CARRIZALEZ Cellphone contained a photograph taken on January 13, 2025 of two firearms on what appears to be the backseat of a car.

c. The firearms in the photo appear to be the Glock Handgun and the Taurus Handgun, and the backseat on which they are sitting in the photograph is consistent with the appearance of the backseat of the Corolla.

8. Based on my training and experience, and communications with other law enforcement agents, including a Special Agent from the Bureau of Alcohol, Tobacco, Firearms, and Explosives, who is familiar with the manufacturing of firearms and ammunition, I am aware of the following:

a. The Glock Handgun was not manufactured in the State of New York and thus must have traveled in interstate commerce before it was seized in New York on January 14, 2025.

b. The Taurus Handgun was not manufactured in the State of New York and thus must have traveled in interstate commerce before it was seized in New York on January 14, 2025.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of WILFREDO JOSE AVENDAÑO CARRIZALEZ and CARLOS GABRIEL SANTOS MOGOLLON, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.

Michael Bonner w/ permission

MICHAEL BONNER
Special Agent
Homeland Security Investigations

Sworn to before me this 17 day of March, 2025.
by reliable electronic means (telephone)

Katharine H. Parker

THE HONORABLE KATHARINE H. PARKER
United States Magistrate Judge
Southern District of New York